

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**PAMELA R. LAY, BRIAN DUCOTE,
RYAN JETER, ALYSSA JAYNES,
MARCUS DEVANE, AND SIMON
SUAREZ, ON BEHALF OF
THEMSELVES AND ALL OTHERS
SIMILARLY SITUATED,
Plaintiffs,**

Plaintiffs,

V.

Civ. No. 5:12-cv-00754-DAE

SPECTRUM CLUBS, INC. AND GOLD'S GYM INTERNATIONAL, INC., GOLD'S TEXAS HOLDINGS GROUP, INC., GBG, INC., GOLD'S ALABAMA, LLC, GOLD'S GYM ROCKIES, LLC, GOLD'S HOLDING CORP., GOLD'S OKLAHOMA, LLC, GOLD'S ST. LOUIS, LLC

Defendants.

JOINT MOTION TO ENTER FINAL JUDGMENT

Gold’s Gym, International, Inc., Gold’s Texas Holdings Group, Inc., GBG Inc., Gold’s Alabama, LLC, Gold’s Gym Rockies, LLC, Gold’s Holding Corp., Gold’s Oklahoma, LLC, Gold’s St. Louis, LLC, Gold’s Holding Corp. and GGI Holdings, Inc. (“Defendants”) and Plaintiffs (collectively the “Parties”) file this Joint Motion to Enter Final Judgment (the “Motion”).

Gold's Gym International, Inc. made offers of judgment to each of the Plaintiffs in this case. All Plaintiffs have accepted the offers of judgment.

As required by Fed. R. Civ. P. 68, Defendants agree that a judgment may be entered jointly against Defendants for damages Plaintiffs allege to have suffered. Defendants further agree that the judgment include an award for attorneys' fees and costs accrued to date. Attached

as Exhibit A is a breakdown of the damages Defendants jointly agree to pay each individual Plaintiff, a breakdown of the amount paid as W-2 income and 1099 damages, and the amount of attorneys' fees Defendants jointly agree to pay on behalf of each Plaintiff.

Defendants agree to pay attorneys' fees directly to Plaintiffs' Counsel.

The parties request that the Court enter a final judgment as outlined above.

PRAYER FOR RELIEF

WHEREFORE, PREMISES CONSIDERED, the Parties pray that this Court grant this Motion and Enter Final Judgment as set forth in the attached proposed judgment.

Respectfully submitted,

/s/ Carrie B. Hoffman

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served via the Court's ECF system upon the attorneys of record on June 2, 2014:

/s/ Carrie Hoffman

Carrie Hoffman